

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

June 7, 2017

Mark A. Mongiovi Regulatory Affairs Manager Delta Analytical Corp. Senoret Chemical Company, Inc. 69 North Locust Street Lititz, PA 17543

Subject: PRIA Label Amendment – Addition of cockroaches to the label

Product Name: Terro Dual Bait Stations EPA Registration Number: 149-21 Application Date: 20 March 2017

Decision Number: 527435

Dear Mr. Mongiovi:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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with FIFRA section 6. If you have any questions, please contact Helen Hull-Sanders by phone at 703-347-0243, or via email at hull-sanders.helen@epa.gov.

Sincerely,

Gene Benbow, Acting Product Manager 4

Invertebrate & Vertebrate Branch 1 Registration Division (7505P)

See to

Office of Pesticide Programs

[MASTER LABEL - COVER PAGE]

TERRO® DUAL BAIT STATIONS

[Alternate Brand Names]

TERRO® Two Bait System

TERRO® Dual Defense Bait System

TERRO® Ant & Roach Dual Defense Baiting System

Kills [Listed] Ants*, Roaches, and Silverfish

TERRO® Dual Bait Station

TERRO® Dual Bait System

TERRO® Multi-Bait System

TERRO® Ant & Roach Baits

ACCEPTED

06/07/2017

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 440 04

149-21

TERRO® Ant & Roach Baits Plus
TERRO® Ant & Roach Bait Stations
TERRO® Ant & Roach Plus Insect Bait

TERRO® Ant & Roach Plus Insect Bait Stations

TERRO® Ant & Roach Plus Dual Bait Stations

TERRO® Complete Ant & Roach Baits

TERRO® Complete Ant & Roach Bait Stations

[Optional Marketing Claims]

- Liquid ant* bait
- Contains [Borax] [&] [Abamectin]
- Use [Indoors] [&] [Outdoors]
- [Liquid] [&] [Paste] [Ant*] [&] [Roach] [&]
 [Silverfish] Killer
- [Liquid] [&] [Paste] [Ant*] [&] [Roach] [&]
 [Silverfish] Bait Solution
- Kills the ants* [&] [roaches] you see and the ants* [&] [roaches] you don't
- Attracts and kills [[listed common household] [ants*]] [&] [roaches]

- Do it yourself [liquid] [&} [paste] bait system [in one [station]]
- No unpleasant odors
- Hate em Bait em
- Attracts Ants* [&] [Insects] [Pests] Fast
- Indoor/Outdoor [Protection]
- Dual Bait Contains both [a] food and water [source]
- Effective against Ants* [&] [Roaches]

[Liquid Bait – EPA Reg. No 149-8] ACTIVE INGREDIENT:

Sodium Tetraborate Decahydrate (Borax)	5.40%
OTHER INGREDIENTS:	94.60%
TOTAL	100.00%
[Paste Bait – EPA Reg. No 73079-13]	
ACTIVE INGREDIENT:	
Abamectin B1	0.05%
OTHER INGREDIENTS:	99.95%

KEEP OUT OF REACH OF CHILDREN

CAUTION (See back panel for additional precautionary statements and first aid)

NET CONTENTS:

[Liquid Bait] [B	ait Stations	fl. oz. (ml) /	_ fl. oz. ((ml)	each
[Paste Bait] [B	ait Stations	oz. (_g) / oz	z. (<u> g</u>) e	each]	

^{*}except fire ants, pharaoh ants, carpenter ants, and harvester ants

[MASTER LABEL - BACK PANEL PAGE 1 OF 2]

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after use and before eating, drinking, chewing gum, using tobacco, or using the toilet.

FIRST AID				
If In Eyes:	 Hold eye open and rinse slowly and gently with water for 15-20 minutes. 			
	 Remove contact lenses, if present, after the first five minutes, then continue rinsing eye. 			
	Call a poison control center or doctor for treatment advice.			
Have the product or label with you when calling a Poison Control Center or doctor or going for treatment. In case of				
emergency, for additional information call 800 858 7378.				

ENVIRONMENTAL HAZARDS

To protect the environment, do not allow bait to enter or run off into storm drains, drainage ditches, gutters or surface waters.

HOW IT WORKS

[Ants*] [listed pests] [and] [roaches] [and] [silverfish] will enter the [easy-to-use] [pre-filled] station to feed on the bait. An ant's* anatomy allows for effective transport and consumption of liquids. Ants* will come in large numbers at first, but will soon disappear. The liquid bait is specifically formulated to allow worker ants* to consume the product and survive long enough to carry the bait to the nest and deliver a dose to the rest of the colony.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

DO NOT USE in edible product areas of food handling establishments, restaurants or other areas where food is commercially prepared or processed. Do not use in serving areas while food is exposed. Avoid contamination of feed and foodstuffs. Place bait in areas inaccessible to children and pets.

FOR USE IN AND AROUND: Homes, Hospitals, Restaurants, Apartments, Grocery Stores, Institutional Buildings, Schools, Cafeterias, Warehouses, Storage Areas, Food Processing Plants, Mobile Homes, Boats, Military Bases, Theaters, Nursing Homes, and on Military, Commercial, and Cruise Ships.

ATTRACTS AND KILLS [[LISTED COMMON HOUSEHOLD] ANTS*] [&] [ROACHES] [LISTED PESTS] [LISTED INSECTS] [INCLUDING]: **Ants:** Acrobat, Allegheny, Argentine, Big headed, Cornfield, Crazy, Ghost, Little black, Odorous house, Pavement, Pyramid, Thief, White footed, and other sweet eating ants* (except fire ants, pharaoh ants, carpenter ants, and harvester ants); **Others:** Roaches, Silverfish.

USING TERRO® DUAL BAIT STATIONS: Remove other sources of food, like crumbs, sugar, and grease spots. Do not place bait stations where insecticide has recently been sprayed, as listed pests may avoid the bait stations. Common areas to place bait stations include along baseboards, in corners of rooms and cabinets, on countertops, under and behind appliances, under sinks, around pipes and water sources, in pantry, on window sills and around doorways, near garbage cans, and along ant* trails.

- 1. [Break pre-filled TERRO® DUAL BAIT STATIONS bait stations apart from plastic frame.]
- 2. Hold bait station firmly with bait pack tab(s) facing up. [Break] [Twist] [Snap] [off] [open] the bait pack tab(s) being careful to not spill the bait.
- 3. [Using the retaining slots in the bait pack tabs, fold back the bait pack tabs and [secure] [attach] [lock] them to station].
- 4. Place bait station on flat surface [with bait pack tab(s) facing up] near where listed pests or their signs have been seen. Place additional TERRO® DUAL BAIT STATIONS bait stations anywhere ants*, roaches, and silverfish may enter your home. Heavily infested areas may require additional bait stations. [For best results, use [all] [number] bait stations to ensure sufficient supply for the listed pests.]
- 5. Monitor placements regularly but do not interfere with the listed pests or bait stations. Replace when bait is depleted or every 3 months.

The key to successful baiting is to ensure there is always a sufficient supply of TERRO® DUAL BAIT STATIONS [bait] when listed pests are present.

^{*}except fire ants, pharaoh ants, carpenter ants, and harvester ants

[MASTER LABEL - BACK PANEL PAGE 2 OF 2]

For further information on successful pest control using the TERRO® brand of [[ant] [&] [insect] control] products, visit our web site (www.Terro.com).

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

STORAGE: Store in a cool dry place. Do not store where children or animals may gain access.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Non-refillable Container. Do not reuse or refill this container. If empty: Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

Manufactured [By] [For]: SENORET CHEMICAL CO., INC. 69 NORTH LOCUST STREET LITITZ, PA 17543

Phone: (24 hour emergency): 1-800-800-1819 www.Terro.com Terro® is a registered trademark of Senoret Chemical Company, Inc.

EPA Reg. No. 149-21 EPA Est. No. XXXXX-XXX

[MASTER LABEL – INDIVIDUAL BAIT STATION LABEL]

TERRO® DUAL BAIT STATIONS

[Liquid Bait – EPA Reg. No. 149-8]	
ACTIVE INGREDIENT:	
Sodium Tetraborate Decahydrate (Borax)	5.40%
OTHER INGREDIENTS:	94.60%
TOTAL	
[Paste Bait – EPA Reg. No. 73079-13]	
ACTIVE INGREDIENT:	
Abamectin B1	0.05%
OTHER INGREDIENTS:	99.95%
TOTAL	1 <u>00.00%</u>

DO NOT ALLOW CHILDREN OR PETS TO PLAY WITH THE BAITS **CAUTION**

See outer package for additional Precautions, First Aid, and complete Directions for Use.

NET CONTENTS:[Liquid Bait] [__ fl. oz. (__ml) / ___ fl. oz. (__ml) each] [Paste Bait] [__ oz. (__g) / ___ oz. (__g) each]

EPA Reg. No. 149-21

EPA Est. No. XXXXX-XX-XXX

[MASTER LABEL – OPTIONAL CLAIMS PAGE 1 OF 2]

- Kills Silverfish
- Kills [Small] [and] [Large] Roaches
- Kills Listed Common Household Ants*
- Contains Sweet/Sugar, Oil/Grease, and Protein
- Contains No Peanut Products
- Contains No Peanuts or Peanut By-Products
- Contains Abamectin, Derived from Soil Microbes
- Multiple Food Attractants
- Ready-to-Use Bait
- Very low odor [formula[s]]
- Kills listed sweet/sugar and grease/protein eating ants
- Kills listed sweet, grease, and protein eating ants
- Uses [4][5] food sources to kill listed ants
- Kills listed ants where they hide/breed
- Attracts listed [foraging/scout/worker] ants
- Ants* begin feeding within 30 minutes
- Starts killing worker ants* in 24 hours
- [1-20] [pre-filled] bait stations
- · Easy bait access
- Easy to open- simply snap [break] [off bait pack tab].
- Snap Tab keeps liquid ant bait fresh until you are ready to use
- Easy to use
- Stay-Fresh snap tab
- Bait Window allows you to monitor [liquid] bait levels
- See-thru window allows you to easily monitor [liquid] bait
- See-thru bait monitor know when to replace bait station
- Bait Monitor lets you know when it is time to replace the bait stations
- Bait monitor [window]
- See-thru bait monitor [window]
- Made in the USA
- Liquid bait technology offers ants both a food and water source
- An ant's anatomy allows for effective transport and consumption of liquids
- This product is specifically formulated to allow worker ants* to consume the product and survive long enough to carry
 the liquid back to the nest and deliver a dose to the rest of the colony.
- Ants can't live without water. TERRO Liquid Ant* Bait contains both a food and water source for ants*. TERRO
 Liquid Ant* Bait is formulated to allow worker ants to consume the product and survive long enough to carry the liquid
 back to the nest and deliver a dose to the rest of the colony.
- [Bait] [stations] not for individual sale
- [Attracts][Lures] listed insects with [both] a food and water source
- Kills [American] [German] Roaches
- Attracts and kills grease and sweet eating ants*
- Prefilled & ready-to-use [bait stations]
- Made in the USA
- Two [2] types of baits eliminates the need for multiple products
- Highly effective on Ants*, Cockroaches and Silverfish
- [Attracts and] Kills Ants*, Cockroaches and Silverfish
- A combination of Liquid Ant* Bait and Insect Paste

[MASTER LABEL - OPTIONAL CLAIMS PAGE 2 OF 2]

- Eliminates the need for multiple products
- Contains 2 [different] baits
- Two [2] Baits in One [1] Station
- [Baiting] combination contains [both] a food and water source
- Two food sources to kill listed ants, [roaches] [&] [silverfish]
- Replace bait stations every 3 months
- [Effective] [use] [against] [for] severe ant* problems
- Dual [Ant & Roach] Defense System
- Dual Defense System kills ants*, [roaches] [&] [silverfish]
- [1-20] Weather-resistant bait stations
- Patented Snapsil "snap opening" [function]
- [Each Bait station combines] 2 food-based lures
- Attracts & Kills Ants* in all feeding cycles [with protein, sugar & water lures]

^{*}except fire ants, pharaoh ants, carpenter ants, and harvester ants